

Exhibit 8

**Kramer Law Office, Inc.**

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**Melody A. Kramer, Esq.**  
mak@kramerlawip.com

VIA FAX 312-321-4299 and FED-EX

January 30, 2008

Mr. Robert S. Mallin  
Brinks Hofer Gilson & Lione  
NBC Tower, Suite 3600  
455 N. Cityfront Plaza Drive  
Chicago, IL 60611-5599

**CONFIDENTIAL OFFER OF COMPROMISE**

Subject To Federal Rules of Evidence § 408

RE: Sorensen Research & Development Trust v. Senco Products, Inc., et al  
USDC for Southern California, Case No. 08cv0071

Dear Mr. Mallin:

I have received your letter dated January 30<sup>th</sup> and the enclosed document bearing the purported signature of a Chinese national.

Again, based upon my detailed review of that document, and my prior extensive research into the issue of inadmissibility of declarations from Chinese nationals and general requirements in the Federal Rules of Evidence, we conclude that the document does not rise to the level of admissible evidence for a wealth of reasons. Also, again, the statements made are unbelievably broad and are, on their face, not credible. A TTI Tooling Manager in China cannot testify as to corporate structure and corporate knowledge.

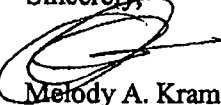
For these reasons and more, we decline your suggestion that the pending lawsuit should be dismissed.

With regard to your request for my work product, that request is also declined. We are beyond the point of having academic discussions; this case is already in litigation. Your client, Senco Products, would be better served by having a conversation with us

Mr. Mallin  
January 30, 2008  
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regarding resolution of this matter. They are welcome to meet with us in San Diego at any time to have a meaningful discussion.

Sincerely,



Melody A. Kramer

**Exhibit 9**

COPY

1                   IN THE COURT OF COMMON PLEAS  
2                   OF PHILADELPHIA COUNTY, PENNSYLVANIA  
3 JAMES MARKHORST           :  
4           Plaintiff           :  
5                   vs.           :  
6 RIDGID, INC.,           : FEBRUARY TERM, 2006  
7           Defendant       : NO. 2539

8  
9                   - - -  
10                   December 13, 2006  
11                   - - -

12                   Telephonic deposition of ROBERT BUGOS,  
13 taken pursuant to notice, at the law offices of  
14 Sacchetta & Baldino, 308 East Second Street,  
15 Media, Pennsylvania, on the above date,  
16 beginning at 3:05 p.m., before Margaret  
17 Robinson, Court Reporter and Notary Public.

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BLUE ROCK REPORTING, INC.  
370 Blue Rock Road  
West Chester, PA 19382  
(610) 761-5150

1 APPEARANCES:

2 BRUCE MacKNIGHT, ESQ.  
3 SACCHETTA & BALDINO  
308 East Second Street  
Media, Pennsylvania 19063  
4 Counsel for Plaintiff

5 MARGARET WENKE, ESQ.  
6 CONNOR, WEBER & OBERLIES  
171 West Lancaster Avenue  
Suite 100  
7 Paoli, Pennsylvania 19301  
8 Counsel for Defendant

9 ALSO PRESENT:

10 Mark Rowe, Esq.  
11 - - -

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1 I N D E X

2 WITNESS PAGE

3 ROBERT BUGOS

4 By Mr. MacKnight 4

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9 E X H I B I T S

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11 NO. DESCRIPTION PAGE

12

13 (No Exhibits Were Marked)

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ROBERT BUGOS

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1 (It was stipulated by and between  
2 counsel that signing, sealing, certification and  
3 filing be waived; and that all objections,  
4 except as to the form of the question, be  
5 reserved until the time of trial.)

6

7 THE WITNESS: Let me just at the  
8 outset, note that I am general counsel for the  
9 corporation pertaining to the deposition for the  
10 limited purpose of identifying ownership  
11 relationships between corporate entities, not a  
12 general submission or a waiver of the attorney  
13 client privilege or attorney client privilege  
14 for any other purpose. If you agree to that.

15 MR. MacKNIGHT: That's fine. If I  
16 ask you anything out of line, I'm sure you'll  
17 let me know or Peggy will let me know.

18 MS. WENKE: Bob, your voice was  
19 trailing a little bit, so you might want to stay  
20 near the phone.

21 THE WITNESS: I will hug the  
22 phone. Mark Rowe just walked into the room. I  
23 just want to let it be known that he is present.

24 MR. MacKNIGHT: Okay.

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ROBERT BUGOS

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1 THE WITNESS: He's an attorney.

2 - - -

3 ROBERT BUGOS, duly sworn according  
4 to the law, was examined and testified as  
5 follows:

6 - - -

7 BY MR. MacKNIGHT:

8 Q. Sir, before we started today, I indicated  
9 I would forego all the particularities with  
10 regard to how we conduct a deposition, because  
11 it's my understanding that you are an attorney,  
12 so I will just begin with my questioning if  
13 that's okay with you.

14 A. That's fine.

15 Q. Sir, can you just give me your full name  
16 please?

17 A. My name is Robert A. Bugos, B as in boy,  
18 U-G-O-S.

19 Q. Mr. Bugos, who do you represent?

20 A. I'm sorry, I don't know how to answer  
21 that.

22 Q. Who do you work for?

23 A. Okay, I am general counsel for Techtronic  
24 Industries North America, Inc. and its various

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1 subsidiaries.

2 Q. And how many subsidiaries are there?

3 A. There are a number of subsidiaries,  
4 including One World Technologies, Inc.

5 Q. And how long have you worked for that  
6 employer?

7 A. I have worked for this employer since its  
8 inception, sometime between 2000 and 2002. I  
9 have been an employee of the organization that  
10 operates the same businesses as that corporate  
11 entity, since those businesses were created in  
12 June of 2000 -- June of 2000..

13 Q. Okay. One of the subsidiaries is One  
14 World Technologies. What is the relationship  
15 between One World Technologies and Ridgid, Inc.,  
16 if you know?

17 A. There is no relationship.

18 Q. Do you know if One World Technologies --

19 A. Wait a minute, I'm sorry, there may be  
20 a -- there may be a contractual relationship  
21 regarding the servicing of products, but I don't  
22 believe that that contractual relationship is  
23 with Ridgid.

24 Q. Does One World Technologies manufacture

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1 any products under the Ridgid name?

2 A. No.

3 Q. Give me one second.

4 A. Would you like me to tell you what One  
5 World Technologies, Inc. does in connection --

6 Q. I was getting to that. Can you just tell  
7 me what you just asked me to ask you, what they  
8 do with regard to the products?

9 A. One World Technologies, Inc., is a wholly  
10 owned subsidiary of Techtronic Industries North  
11 America, Inc.

12 One World Technologies, Inc., also  
13 acts as a supplier of Ridgid brand products to  
14 Home Depot, which I understand owns a license  
15 for the use of the Ridgid trademark.

16 Q. Okay, so another entity manufactures the  
17 tools?

18 A. Ridgid brand products are marketed by One  
19 World Technologies to the Home Depot, are  
20 sourced through a parent company, ultimate  
21 parent company, Techtronic Industries Company  
22 Limited.

23 Q. Does One World Technology design the  
24 tools?

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1 A. One World Technologies, Inc., I imagine  
2 has had design input in connection with the line  
3 of various Ridgid brand products.

4 Q. Can you tell me how a Ridgid tool is  
5 made?

6 A. A Ridgid tool is made by a manufacturer,  
7 which -- I'm sorry, I don't know how to answer  
8 that question.

9 Q. Sir, are you familiar with the tool  
10 that's in question in this case, the twelve inch  
11 compound miter saw with exact line?

12 A. I am familiar with the Ridgid line of  
13 power tools and I have seen the tool that's  
14 mentioned in this case. I have familiarity with  
15 the particulars of the design.

16 Q. Was that tool distributed by One World  
17 Technologies?

18 A. It is.

19 Q. With regard to registered agent for  
20 service, is there a registered agent in South  
21 Carolina for One World Technologies?

22 A. Yes.

23 Q. Are you aware if there's a registered  
24 agent in South Carolina for Ridgid?

ROBERT BUGOS

9

1 A. No, I am not aware.

2 Q. And where is that registered agent  
3 located with regard to One World Technologies?

4 A. Sitting at my desk.

5 Q. You're sitting at your desk.

6 A. I'm the registered agent for One World  
7 Technologies, Inc., in the state of South  
8 Carolina.

9 Q. Can you tell me sir, do you know somebody  
10 with the last name, it looks like Brock,  
11 B-R-O-C-K?

12 A. I do know somebody with the last name  
13 Brock, B-R-O-C-K.

14 Q. With the first initial C?

15 A. No.

16 Q. Excuse me?

17 A. No.

18 Q. I have a copy of a return receipt for  
19 some registered mail that was mailed to 1428  
20 Pearman Dairy Road, Anderson, South Carolina,  
21 29625.

22 A. Yes.

23 Q. Is that your address?

24 A. It is my address, it's our office

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1 address, yes.

2 Q. And it's addressed to Ridgid, Inc., and  
3 it was signed for by somebody with the last name  
4 of Brock, on March 3, 2006.

5 A. Okay.

6 Q. Would that -- and I want to represent to  
7 you sir, that that was the Complaint in this  
8 matter. Would that come across your desk?

9 A. I'm not aware that it has.

10 Q. Are you permitted to sign and accept  
11 Complaints served at that office, addressed to  
12 Ridgid?

13 A. I personally do not have authority to  
14 accept documents on behalf of Ridgid, Inc.

15 Q. And sir, from your memory or from your  
16 records, do you have any indication that you  
17 received this Complaint against Ridgid, back in  
18 March of 2006?

19 A. I do not.

20 Q. If you had received it, would you have  
21 forwarded it to Ridgid?

22 A. Um, I would anticipate that our  
23 department may have. I don't know. Don't know  
24 what would have happened. As I said, I don't

ROBERT BUGOS

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1 have a recollection of it happening.

2 Q. So you don't know sir, what steps were  
3 taken if that Complaint was served there?

4 A. I don't know what steps were taken in  
5 connection with that document. I don't have a  
6 recollection.

7 Q. Sir, do you know -- are you familiar with  
8 the manual for the tool that's in question here?

9 A. I am familiar with the manuals in  
10 general, that are used on Ridgid brand products  
11 that are manufactured through One World  
12 Technologies, Inc.

13 Q. And would you confirm or would you agree  
14 with the statement that nowhere on that tool, is  
15 it indicated that it is distributed by One World  
16 Technologies?

17 A. I can't confirm or deny that statement.  
18 I would refer you to the owner's manual itself.

19 Q. Sir, the warranties with regard to this  
20 product, does Ridgid provide the warranty or  
21 does One World Technology provide the warranty?

22 A. One World Technologies, Inc., provides  
23 any warranty on products that it services, to  
24 include this one.

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1 Q. Can you tell me sir, have you ever  
2 received anything by way of a Complaint, at your  
3 address there, addressed to Ridgid?

4 A. I have no recollection of receiving mail  
5 addressed to Ridgid.

6 Q. Ever?

7 A. None.

8 MS. WENKE: I'd like to make a  
9 statement for the record. A few moments ago  
10 there was a reference that the service was of a  
11 Complaint. That document was a Writ, not a  
12 Complaint.

13 MR. MacKNIGHT: I apologize for  
14 the mistake.

15 BY MR. MacKNIGHT:

16 Q. Sir, you spoke about the owner's manual.  
17 In the owner's manual, it mentions One World  
18 Technology and gives a toll free number. Is  
19 that your understanding?

20 A. I would be surprised if it didn't.

21 Q. Do you know if you call that number,  
22 whether they represent themselves as One World  
23 Technologies or Ridgid?

24 A. I believe if you call that number, you



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1 would get our service department, which is at  
2 the other end of this building. I don't know --  
3 I would -- I have no reason to believe they  
4 would represent themselves as Ridgid.

5 Q. Have you ever had the opportunity to call  
6 that number and ask that question?

7 A. I have not.

8 Q. And you have no knowledge about whether  
9 Ridgid has a registered agent in South Carolina?

10 A. I have no reason to believe they do. I  
11 have no knowledge that they have a presence in  
12 South Carolina.

13 Q. Just give me one second, I'm just looking  
14 at something. Sir, I'm going to -- I have an  
15 e-mail here and unfortunately you don't have it,  
16 but it's an e-mail from Ms. Wenke, indicating we  
17 had asked about some information identifying the  
18 product -- I'm sorry, Lisa Cauley, who works  
19 with Ms. Wenke, and we had inquired about some  
20 of the information about this product and we  
21 received back information that it was designed  
22 and distributed by One World Technologies and  
23 they gave us your address which I mentioned  
24 earlier, and sold through Home Depot and the

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1 date of manufacture and the year.

2 Do you know how she would have  
3 obtained that information? Would it have been  
4 through you or through Ridgid?

5 A. She would have obtained that information  
6 through Mark Rowe of our legal department and  
7 she would have obtained it through us, because  
8 we would be the people familiar with the  
9 product, the serial numbers and the coding  
10 system and Ridgid, Inc. would not.

11 Q. Do you know if it was relayed to -- this  
12 e-mail is dated Monday August 7, 2006. Do you  
13 know if it was relayed to your office, as to why  
14 this information was being requested?

15 A. I do not.

16 Q. Sir, if the certified mail that was sent  
17 to you was the Writ, was not returned to our  
18 office, is it reasonable to believe that you  
19 either retained it or forwarded it on to Ridgid?

20 A. I have no information as to that.

21 Q. Do you know why they came to you instead  
22 of going to Ridgid, to find out where the  
23 product was manufactured and distributed from?

24 A. It was our product.

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1 Q. What's the general relationship between  
2 Ridgid and One World Technologies?

3 A. Between who?

4 Q. Between One World Technologies and  
5 Ridgid.

6 A. By Ridgid, are you referring to Ridgid,  
7 Inc.?

8 Q. Well whatever you understand it to be.

9 A. Ridgid is a trademark.

10 Q. Okay, and how are you permitted to use  
11 that trademark?

12 A. We manufacture Ridgid brand products as a  
13 supplier to Home Depot. There's a trademark  
14 license from the owner of the trademark, which I  
15 presume to be, as you've been calling them,  
16 Ridgid, Inc., so I believe that's the trademark  
17 owner. I understand it to be some entity owned  
18 by or controlled by Emerson.

19 Q. Emerson. That was my next question.  
20 What's the relationship between Emerson and One  
21 World Technologies?

22 A. I believe we service, we provide customer  
23 service under contract for certain products that  
24 were manufactured by Emerson.

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1 Q. And would it be accurate to say that  
2 Emerson and One World Technologies entered into  
3 a partnership back in 2003?

4 A. That would be absolutely incorrect.

5 Q. Well what's the relationship between  
6 Emerson and One World Technologies?

7 A. One World Technologies entered into a  
8 contract with Emerson. We provide customer  
9 service in connection with certain products that  
10 were manufactured and sold by Emerson.

11 Q. Sir, I have a document here that I  
12 printed from the internet, from the Emerson  
13 website, regarding Emerson professional tools  
14 and One World Technologies.

15 The title of it is, Emerson  
16 Professional Tools and One World Technologies to  
17 partner on Ridgid power tool line.

18 A. I'm sorry, what does that say?

19 Q. It says: Emerson professional tools and  
20 One World Technologies to partner on Ridgid  
21 power tool line.

22 And it's from the Emerson website.  
23 And basically there's a Pat Sly quoted as the  
24 Emerson executive vice-president and the Emerson

ROBERT BUGOS

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1 professional tool business leader, who states:  
2 This new partnership and business model will  
3 further enhance an innovative line of power  
4 tools that already has the respect of end users  
5 everywhere.

6 A. Okay.

7 Q. In your mind, is partnership the wrong  
8 word for it, or is this article inaccurate?

9 A. Unfortunately I am not the person who  
10 chose that word. I'm not the person who chose  
11 that document.

12 I have not seen that document;  
13 however, I take it that you're trying to impose  
14 a legal definition of an entity in the word  
15 choice of marketing people, which I know to be  
16 totally inconsistent with reality.

17 Q. And you indicated that you don't  
18 manufacture any of the tools, you just  
19 distribute them; is that right?

20 A. That's correct.

21 Q. Okay, so it would also be inaccurate for  
22 this article, when they go on to state -- and  
23 this is from a Bob Freitag, executive  
24 vice-president of One World Technologies. Do

ROBERT BUGOS

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1 you know who he is?

2 A. I know who he is.

3 Q. There's a quote in here from him that  
4 says: This is quite an honor for One World  
5 Technologies to manufacture these bench top and  
6 stationary tools.

7 A. We source the tools, so in his mind, we  
8 manufacture them, but in order for me to give  
9 you an accurate statement, you've asked me if --

10 Q. Who manufactures the tools?

11 A. Well a variety of people manufacture the  
12 products. They are sourced through our parent  
13 company and it might be manufactured by them or  
14 it might be manufactured by a third party that  
15 they contract.

16 Q. Okay, so let me try to understand this.  
17 You source the tools, which means? What does  
18 source mean in your mind?

19 A. Well Home Depot buys them from us, we buy  
20 them from somebody else. The third party we buy  
21 them from is our parent company in Hong Kong.

22 Our parent company in Hong Kong  
23 may be the manufacturer, or it may be somebody  
24 else.

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1 In the mind of somebody who's  
2 marketing the tools, we manufacture the product,  
3 but to be accurate for purposes of the  
4 deposition, I answered you as no, because --

5 Q. I'm sorry, you trailed off there.

6 A. The corporate entity, One World  
7 Technologies, Inc., technically does not  
8 manufacture anything.

9 Q. So is it Techtronic that manufactures  
10 them?

11 A. It may be, or they may source it from a  
12 third party.

13 Q. A third party not related to Techtronic,  
14 or another subsidiary?

15 A. It could be either.

16 Q. So your main role with regard to these  
17 Ridgid tools that are manufactured by the parent  
18 company or another subsidiary, is placing the  
19 product in the stream of commerce over here in  
20 America?

21 A. Well I don't want to mislead you. Our  
22 corporate entity, One World Technologies, Inc.,  
23 plays a major role in the development of the  
24 product and decisions in regards to what that

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1 product will be like.

2 We may have engineering input into  
3 the design of the product, in some cases we may  
4 not.

5 Q. Sir, could I ask you when you first  
6 became aware of this claim by Mr. Markhorst?

7 A. I have no recollection regarding this  
8 claim prior to this week; however, I have become  
9 aware of many claims and I may have at some time  
10 known it prior to.

11 Q. I'm sorry, prior to today?

12 A. Prior to this week.

13 Q. Sir, do you know if One World  
14 Technologies has ever been involved in any type  
15 of lawsuit in Pennsylvania?

16 A. Yes, I do.

17 Q. And when that occurred, who would  
18 represent One World Technologies in  
19 Pennsylvania?

20 A. It varies. We've had probably a dozen  
21 firms over the course of the years that have  
22 represented One World Technologies, Inc.

23 Q. I have to ask the question. Has  
24 Ms. Wenke's firm ever represented your company?

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1 A. I believe she has.

2 Q. Pardon me?

3 A. I believe she has, yes.

4 MS. WENKE: I don't believe I've  
5 ever represented One World Technologies, per se.

6 THE WITNESS: That's possible.

7 BY MR. MacKNIGHT:

8 Q. You thought you did, but Ms. Wenke  
9 doesn't believe that's true.

10 A. We're talking about One World  
11 Technologies?

12 Q. Yes.

13 A. I don't know. I don't know specifically.

14 Q. Okay. Let me ask you this, do the  
15 interests of One World Technologies, are they  
16 the same as the interests of Ridgid, with regard  
17 to sales of the tools and manufacture of the  
18 tools?

19 A. You're asking me to draw a legal  
20 conclusion in connection with something that I'm  
21 not quite sure the scope of that and I don't  
22 think that it's appropriate for me to answer  
23 that question.

24 MS. WENKE: I would object to

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1 that.

2 MR. MacKNIGHT: Okay.

3 BY MR. MacKNIGHT:

4 Q. Who sourced the tool, the Markhorst tool  
5 that's involved in this case?

6 A. To the best of my knowledge, the tool  
7 that you've described to me as being a Ridgid  
8 brand miter saw with an exact line feature,  
9 would have been a product that would be sourced  
10 by One World Technologies, Inc.

11 Q. And what does that mean when you say  
12 sourced?

13 A. They sold it to Home Depot.

14 Q. They sold it to Home Depot. And do you  
15 have any knowledge who manufactured it?

16 A. I do not know specifically; however, as I  
17 mentioned before, the Ridgid brand power tools  
18 that are marketed by One World Technologies,  
19 Inc. to Home Depot, are sourced by -- from One  
20 World Technology, Inc.'s ultimate parent in Hong  
21 Kong, which is Techtronic Industries Company  
22 Limited.

23 Q. Okay. I think that's all I have for you,  
24 sir. Thank you for participating today.

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1 MS. WENKE: Thank you.

2 THE WITNESS: Do you have any

3 questions?

4 MS. WENKE: No, I have none.

5 - - -

6 (Deposition concluded at

7 3:30 p.m.)

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ROBERT BUGOS

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1 STATE OF PENNSYLVANIA )  
2 COUNTY OF CHESTER ) SS

3 I, Margaret Robinson, Shorthand Reporter  
4 and Notary Public duly and qualified in and for  
5 the State of Pennsylvania, do hereby certify  
6 there came before me the deponent herein, namely  
7 ROBERT BUGOS, who was by me duly sworn to  
8 testify to the truth and nothing but the truth  
9 concerning the matters in this cause.

10 I further certify that the foregoing  
11 transcript is a true and correct transcript of  
12 my original stenographic notes.

13 I further certify that I am neither  
14 attorney or counsel for, nor related to or  
15 employed by any of the parties to the action in  
16 which this deposition is taken; and furthermore,  
17 that I am not a relative or employee of any  
18 attorney or counsel employed by the parties  
19 hereto or financially interested in the action.


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Margaret Robinson  
Notary Public